

## **EXHIBIT D**

**Salah M. Hawkins**

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**From:** Rosella, Michael <michael.rosella@katten.com>  
**Sent:** Friday, October 2, 2020 2:16 PM  
**To:** Paul Zumbro; Salah M. Hawkins  
**Cc:** Banich, Terence G.; Lawrence, Carl M.; Sears Info  
**Subject:** Sears - Stanley Black & Decker  
**Attachments:** Waterloo Industries Inc.pdf

External ([michael.rosella@katten.com](mailto:michael.rosella@katten.com))

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Paul,

As you know, Katten is special avoidance counsel to the Debtors in the Sears Holdings Corporation, *et al.* chapter 11 cases. I am reaching out to inform you that we will be commencing an avoidance action against your clients Black & Decker (U.S.) Inc., Black & Decker Macao, and Waterloo Industries Inc. on or before October 15, 2020.

Attached for your reference is a copy of the demand letter sent to Waterloo Industries on September 9, 2020.

Please let us know if you have any questions. Thank you very much.

**Michael Rosella**

Associate

**Katten**

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